# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

## Cargill, Inc. Burns Waterway Harbor Portage, IN 46368

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 127-11201-00025		
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:	

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D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

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- D.1.5 Control Device Required for Particulate Matter (PM)
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- D.1.7 Parametric Monitoring
- D.1.8 Control Device Inspections

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

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#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 326 IAC 12 (40 CFR 60.302, Subpart DD)
- D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

#### **Compliance Determination Requirements**

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

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#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.2.5 Control Device Required for Particulate Matter (PM)
- D.2.6 Visible Emissions Notations
- D.2.7 Parametric Monitoring
- D.2.8 Control Device Inspections

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.9 Record Keeping Requirements
- D.2.10 Reporting Requirements

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#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.3.1 326 IAC 12 (40 CFR 60.302, Subpart DD)
- D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

#### **Compliance Determination Requirements**

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.3.5 Control Device Required for Particulate Matter (PM)
- D.3.6 Visible Emissions Notations
- D.3.7 Parametric Monitoring
- D.3.8 Control Device Inspections

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.3.9 Record Keeping Requirements
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#### SECTION D.4 FACILITY OPERATION CONDITIONS System #4

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.4.1 326 IAC 12 (40 CFR 60.302, Subpart DD)
- D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

#### **Compliance Determination Requirements**

D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.4.5 Control Device Required for Particulate Matter (PM)
- D.4.6 Visible Emissions Notations
- D.4.7 Parametric Monitoring
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#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.4.9 Record Keeping Requirements
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#### SECTION D.5 FACILITY OPERATION CONDITIONS System #5

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.5.1 326 IAC 12 (40 CFR 60.302, Subpart DD)
- D.5.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

#### **Compliance Determination Requirements**

D.5.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.5.5 Control Device Required for Particulate Matter (PM)
- D.5.6 Control Device Inspections

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.5.7 Record Keeping Requirements
- D.5.8 Reporting Requirements

#### SECTION D.6 FACILITY OPERATION CONDITIONS Grain Dryers DR41 and DR43

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.6.1 326 IAC 12 (40 CFR 60.302, Subpart DD)
- D.6.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]
- D.6.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.6.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

#### **Compliance Determination Requirements**

D.6.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.6.6 Control Device Required for Particulate Matter (PM)
- D.6.7 Visible Emissions Notations
- D.6.8 Parametric Monitoring
- D.6.9 Control Device Inspections

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.6.10 Record Keeping Requirements
- D.6.11 Reporting Requirements

#### SECTION D.7 FACILITY OPERATION CONDITIONS Open Grain Storage Pile

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.7.1 Fugitive Dust Emissions [326 IAC 6-4]

#### **Compliance Determination Requirements**

D.7.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.7.3 Record Keeping Requirements
- D.7.4 Reporting Requirements

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#### **SECTION A**

#### SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

#### General Information [326 IAC 2-8-3(b)] A.1

The Permittee owns and operates a grain elevator.

Authorized individual: Mr. Jim Simpson

Source Address: Burns Waterway Harbor, Portage, IN 46368

Mailing Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368

Phone Number: 219-787-5704

SIC Code: 5153 Porter County Location:

County Status: Nonattainment for ozone

Attainment for all other criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)

Minor Source, under PSD or Emission Offset Rules;

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This source consists of the following emission units and pollution control devices:

- Two truck dumps, one rail car dump, and one rail loadout, all referred to as System #1, (a) controlled by baghouse DS61rated at 99.99% efficiency.
- (b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225) & discharge (#BC-205) conveyor intake (#BC-203), all referred to as System #2, controlled by baghouse DS62 rated at 99.99% efficiency.
- (c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three surge hoppers, weigh hopper (#S-14), all referred to as System #3, controlled by baghouse DS63 rated at 99.99% efficiency.
- (d) The Peco loading system and ship loading, all referred to as System #4, controlled by baghouse DS65 rated at 99.99% efficiency.
- (e) Pneumatic dust handling system, DR41 and DR43, referred to as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is recirculated into the dust handling system.
- (f) Two (2) natural gas fired grain dryers, each rated at 40 million BTU per hour, with particulate emissions controlled by an internal cyclone and filter bed rated at 98.0% efficiency.
- One open-grain storage pile, with a maximum capacity of 750,000 bushels. (g)

#### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

#### A.4 FESOP Applicability [326 IAC 2-8-2]

This source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

#### A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

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#### **SECTION B**

#### **GENERAL CONDITIONS**

#### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

#### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

#### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

#### B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

#### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

#### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

#### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

#### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

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(c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

#### B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

#### B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

#### B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

#### B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. Cargill, Inc. Page 11 of 45
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(c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was based on continuous or intermittent data;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAM may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMPs shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

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#### B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - Ouring the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or.

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967.

Failure to notify IDEM, OAM by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

#### B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or

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(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]
  - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
  - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
    - (1) That this permit contains a material mistake.
    - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
    - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
  - (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
  - (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
  - (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

#### B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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#### B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act:
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and

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(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]

  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

#### B.20 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

#### B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit:
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

#### B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

#### B.23 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

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#### SECTION C

#### SOURCE OPERATION CONDITIONS

#### **Entire Source**

#### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
  - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on June 30, 1999. The plan consists of enclosing loading and unloading operations, enclosing grain transfer operations, and utilizing open grain storage only in overflow situations.

#### C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, air pollution control devices listed in this permit and used to comply with an applicable requirement shall be operated at all times that an emission unit vented to the control device is in operation.

#### C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

All demolition projects require notification whether or not asbestos is present.

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

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All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the applicable emission control procedures in 326 IAC
  14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are
  applicable for any removal or disturbance of RACM greater than three (3) linear feet on
  pipes or three (3) square feet on any other facility components or a total of at least 0.75
  cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
  The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
  prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to
  thoroughly inspect the affected portion of the facility for the presence of asbestos. The
  requirement that the inspector be accredited is federally enforceable.

#### Testing Requirements [326 IAC 2-8-4(3)]

#### C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

#### C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

#### Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

#### (a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

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(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

### C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this
  permit, the Permittee shall take appropriate corrective actions. The Permittee shall
  submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of
  receipt of the test results. The Permittee shall take appropriate action to minimize
  emissions from the affected facility while the corrective actions are being implemented.
  IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions
  taken are deficient. The Permittee shall submit a description of additional corrective
  actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.
  IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant
  stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

#### C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

(b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

#### C.17 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C - Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

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(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

#### C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation:
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are

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not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period. Such report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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#### **Stratospheric Ozone Protection**

#### C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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#### SECTION D.1

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

Two truck dumps, one rail car dump, and one rail loadout, all referred to as System #1, controlled by baghouse DS61 rated at 99.99% efficiency.

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### 326 IAC 12 (40 CFR 60.302, Subpart DD)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators:"

- fugitive emissions from truck unloading operations shall be limited to 5% opacity. (a)
- fugitive emissions from railcar unloading operations shall be limited to 5% opacity. (b)
- fugitive emissions from railcar loading operations shall be limited to 5% opacity. (c)
- nonfugitive emissions shall be limited to 0.0088 gr/dscf and 0% opacity. (d)

For an air flow rate of 42,000 actual cubic feet per minute, this condition will limit particulate emissions to 3.15 pounds per hour. Compliance with this condition will establish compliance with Operation Permit 64-07-89-0186, which limits particulate emissions from this facility and System #4 to 20 tons per year. Compliance with this condition will also render the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, not applicable.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.

#### Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

#### **Compliance Determination Requirements**

#### Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.5 Control Device Required for Particulate Matter (PM)

The control device for PM control shall be in operation at all times when the facility is in operation.

#### D.1.6 Visible Emissions Notations

Daily visible emission notations of the stack exhaust shall be performed during normal

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daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are "normal" or "abnormal."

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the control device at least once weekly when the facility is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control device shall be maintained within the range of 2.5 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure drop shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

#### D.1.8 Control Device Inspections

An inspection shall be performed of the control device as outlined in the preventive maintenance plan, but not less than once every six (6) months. All defective parts shall be repaired or replaced as necessary.

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.1.9 Record Keeping Requirements

- (b) To document compliance, the Permittee shall maintain a log of daily visible emission observations, weekly pressure gage readings, operation and preventive maintenance logs (including work purchases orders), and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

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#### SECTION D.2

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225) & discharge (#BC-205) conveyor intake (#BC-203), all referred to as System #2, controlled by baghouse DS62 rated at 99.99% efficiency.

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 326 IAC 12 (40 CFR 60.302, Subpart DD)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators:"

(a) emissions shall be limited to 0.001 gr/dscf and 0% opacity.

For an air flow rate of 28,000 actual cubic feet per minute, this condition will limit particulate emissions to 0.24 pounds per hour. Compliance with this condition will establish compliance with Operation Permit 64-07-89-0187, which limits particulate emissions from this facility and System #3 to 2 tons per year. Compliance with this condition will also render the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, not applicable.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

#### **Compliance Determination Requirements**

#### D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Method 9 for opacity, or other methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.5 Control Device Required for Particulate Matter (PM)

The control device for PM control shall be in operation at all times when the facility is in operation.

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#### D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are "normal" or "abnormal."

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the control device at least once weekly when the facility is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control device shall be maintained within the range of 2.5 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

#### D.2.8 Control Device Inspections

An inspection shall be performed of the control device as outlined in the preventive maintenance plan, but not less than once every six (6) months. All defective parts shall be repaired or replaced as necessary.

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.2.9 Record Keeping Requirements

- (b) To document compliance, the Permittee shall maintain a log of daily visible emission observations, weekly pressure gage readings, operation and preventive maintenance logs (including work purchases orders), and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

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#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three surge hoppers, weigh hopper (#S-14), all referred to as System #3, controlled by baghouse DS63 rated at 99.99% efficiency.

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 326 IAC 12 (40 CFR 60.302, Subpart DD)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators:"

(a) emissions shall be limited to 0.001 gr/dscf and 0% opacity.

For an air flow rate of 21,000 actual cubic feet per minute, this condition will limit particulate emissions to 0.18 pounds per hour. Compliance with this condition will establish compliance with Operation Permit 64-07-89-0187, which limits particulate emissions from this facility and System #2 to 20 tons per year. Compliance with this condition will also render the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, not applicable.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

#### **Compliance Determination Requirements**

#### D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Method 9 for opacity, or other methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.3.5 Control Device Required for Particulate Matter (PM)

The control device for PM control shall be in operation at all times when the facility is in operation.

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#### D.3.6 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are "normal" or "abnormal."

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the control device at least once weekly when the facility is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control device shall be maintained within the range of 2.5 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

#### D.3.8 Control Device Inspections

An inspection shall be performed of the control device as outlined in the preventive maintenance plan, but not less than once every six (6) months. All defective parts shall be repaired or replaced as necessary.

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.3.9 Record Keeping Requirements

- (b) To document compliance, the Permittee shall maintain a log of daily visible emission observations, weekly pressure gage readings, operation and preventive maintenance logs (including work purchases orders), and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.3.10 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

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#### SECTION D.4

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

The Peco loading system and ship loading, all referred to as System #4, controlled by baghouse DS65 rated at 99.99% efficiency.

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.4.1 326 IAC 12 (40 CFR 60.302, Subpart DD)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators:"

- (a) fugitive emissions from barge and ship loading operations shall be limited to 20% opacity.
- (b) nonfugitive emissions shall be limited to 0.0088 gr/dscf and 0% opacity.

For an air flow rate of 19,000 actual cubic feet per minute, this condition will limit particulate emissions to 1.42 pounds per hour. Compliance with this condition will establish compliance with Operation Permit 64-07-89-0186, which limits particulate emissions from this facility and System #1 to 20 tons per year. Compliance with this condition will also render the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, not applicable.

#### D.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.

#### D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

#### **Compliance Determination Requirements**

#### D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Method 9 for opacity, or other methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.4.5 Control Device Required for Particulate Matter (PM)

The control device for PM control shall be in operation at all times when the facility is in operation.

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#### D.4.6 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are "normal" or "abnormal."

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.4.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the control device at least once weekly when the facility is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control device shall be maintained within the range of 2.5 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

#### D.4.8 Control Device Inspections

An inspection shall be performed of the control device as outlined in the preventive maintenance plan, but not less than once every six (6) months. All defective parts shall be repaired or replaced as necessary.

#### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.4.9 Record Keeping Requirements

- (b) To document compliance, the Permittee shall maintain a log of daily visible emission observations, weekly pressure gage readings, operation and preventive maintenance logs (including work purchases orders), and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.4.10 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

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#### **SECTION D.5**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-8-4(10)]:

Pneumatic dust handling system referred to as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is recirculated into the dust handling system.

#### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.5.1 326 IAC 12 (40 CFR 60.302, Subpart DD)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators:"

(a) emissions shall be limited to 0.001 gr/dscf and 0% opacity.

For a system with no air flow to the outside atmosphere, this condition will limit particulate emissions to 0 pounds per hour. This facility will be considered in compliance provided the exhaust from the control device is recirculated to the dust handling system in a closed loop. Compliance with this condition will establish compliance with Operation Permit 64-07-89-0187, and render the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, not applicable.

#### D.5.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.

#### D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

#### **Compliance Determination Requirements**

#### D.5.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.5.5 Control Device Required for Particulate Matter (PM)

The control device for PM control shall be in operation at all times when the facility is in operation. Furthermore, the exhaust from the control device shall be recirculated to the dust handling system in a closed loop.

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# D.5.6 Control Device Inspections

An inspection shall be performed of the control device as outlined in the preventive maintenance plan, but not less than once every six (6) months. All defective parts shall be repaired or replaced as necessary.

# Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

# D.5.7 Record Keeping Requirements

- (b) To document compliance, the Permittee shall maintain a log of operation and preventive maintenance logs (including work purchases orders), and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

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#### **SECTION D.6**

#### **FACILITY OPERATION CONDITIONS**

# Facility Description [326 IAC 2-8-4(10)]:

Two (2) natural gas fired grain dryers, DR41 and DR43, each rated at 40 million BTU per hour, with particulate emissions controlled by an internal cyclone and filter bed rated at 98.0% efficiency.

# Emission Limitations and Standards [326 IAC 2-8-4(1)]

### D.6.1 326 IAC 12 (40 CFR 60.302, Subpart DD)

Pursuant to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators:"

(a) emissions from grain dryers shall be limited to 0% opacity.

# D.6.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

This facility shall be limited to 29,500,000 bushels of grain dried per 12-month period, based on a monthly rolling total. This limit will establish compliance with Operation Permit 64-07-89-0188, by limiting particulate emissions below 25 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements will not apply.

# D.6.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the particulate matter emissions shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$ rate of emission in pounds per hour; and  $P =$ process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour.

# D.6.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

# **Compliance Determination Requirements**

# D.6.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Method 9 for opacity, or other methods as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

# Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.6.6 Control Device Required for Particulate Matter (PM)

The control device for PM control shall be in operation at all times when the facility is in operation.

#### D.6.7 Visible Emissions Notations

(a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are "normal" or "abnormal."

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(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.6.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the control device at least once weekly when the facility is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the control device shall be maintained within the range of 2.5 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM and shall be calibrated at least once every six (6) months.

# D.6.9 Control Device Inspections

An inspection shall be performed of the control device as outlined in the preventive maintenance plan, but not less than once every six (6) months. All defective parts shall be repaired or replaced as necessary.

# Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.6.10 Record Keeping Requirements

- (a) Records shall be made and kept of the total bushels of grain dried per calendar month from this facility.
- (b) To document compliance, the Permittee shall maintain a log of daily visible emission observations, weekly pressure gage readings, operation and preventive maintenance logs (including work purchases orders), and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

# D.6.11 Reporting Requirements

A quarterly summary of the information to document compliance shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

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#### **SECTION D.7**

#### **FACILITY OPERATION CONDITIONS**

# Facility Description [326 IAC 2-8-4(10)]:

One open grain storage pile with a maximum capacity of 750,000 bushels.

# Emission Limitations and Standards [326 IAC 2-8-4(1)]

# D.7.1 Fugitive Dust Emissions [326 IAC 6-4]

As previously stated in Section C of this permit, the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

# **Compliance Determination Requirements**

#### D.7.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit.

# Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

# D.7.3 Record Keeping Requirements

The Permittee is not required to keep records on this facility by this permit.

# D.7.4 Reporting Requirements

The Permittee is not required to submit reports on this facility by this permit.

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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Cargill, Inc.

Source Address: Burns Waterway Harbor, Portage, IN 46368

Mailing Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368

Permit No.: 127-11201-00025

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Date:

Cargill, Inc. Portage, IN 46368 Permit Reviewer: Allen R. Davidson

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT

# **COMPLIANCE DATA SECTION**

P.O. Box 6015 100 North Senate Avenue Indianapolis, Indiana 46206-6015 Phone: 317-233-5674

Fax: 317-233-5967

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY/DEVIATION OCCURRENCE REPORT

O N	O = ===!!! I = =		

Source Name: Cargill, Inc.

Source Address: Burns Waterway Harbor, Portage, IN 46368

Mailing Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368

Permit No.: 127-11201-00025

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7					

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CII	CCV	either No. 1 of No.2
9	1.	This is an emergency as defined in 326 IAC 2-7-1(12)  CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)

CThe Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

f any of the following are not applicable, mark N/A	Page 2 of 2
Date/Time Emergency/Deviation started:	
Date/Time Emergency/Deviation was corrected:	
Was the facility being properly operated at the time of the emergency/deviation? Y Describe:	N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency/deviation:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities are necessary imminent injury to persons, severe damage to equipment, substantial loss of capital involves of product or raw materials of substantial economic value:	
Form Completed by: Title / Position: Date: Phone:	

Cargill, Inc. Portage, IN 46368 Permit Reviewer: Allen R. Davidson

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Source Address: Mailing Address: Permit No.:	ce Address: Burns Waterway Harbor, Portage, IN 46368 ng Address: 6640 Ship Drive, Port of Indiana, Portage, IN 46368				
Months:	_ to Yo	ear:			
This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".					
9 NO DEVIATIONS	OCCURRED THIS REP	ORTING PERIOD.			
9 THE FOLLOWING	DEVIATIONS OCCUR	RED THIS REPORTING PERIO	OD.		
	<b>litoring Requirement</b> Condition D.1.3)	Number of Deviations	Date of each Deviation		
Form	Completed By:				
Title/F	Position:				
Date:					
Phone	e:				

Attach a signed certification to complete this report.

Cargill, Inc. Portage, IN 46368 Permit Reviewer: Allen R. Davidson

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

	Part	t 70 Quarterly Report				
Source Name: Source Address Mailing Address Part 70 Permit N Facility: Parameter: Limit:	:: 6640 Ship Drive, l No.: 127-11201-00025 Grain Dryers Grain Dried	Burns Waterway Harbor, Portage, IN 46368 6640 Ship Drive, Port of Indiana, Portage, IN 46368 127-11201-00025 Grain Dryers Grain Dried 29,500,000 bushels of grain (corn, wheat or soybeans) dried per 12-month				
Months:	to	_ Year:				
	Column 1	Column 2	Column 1 + Column 2			
Month	This Month	Previous 11 Months	12 Month Total			
9	No deviation from the limi	t occurred in this quarter.				
	Deviations occurred in this Deviation has been report	s quarter. ted on:				
	Submitted by:					
	Title / Position:					
	Signature:					
	Date:					
	Phone:					

# Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

#### **Source Background and Description**

Source Name: Cargill, Inc.

**Source Location:** Burns Waterway Harbor, Portage, IN 46368

**County:** Porter **SIC Code:** 5153

Operation Permit No.: 127-11201-00025
Permit Reviewer: Allen R. Davidson

On June 30, 1999, the Office of Air Management (OAM) received a FESOP application from Cargill, Inc. relating to the operation of a grain terminal.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Two truck dumps, one rail car dump, and one rail loadout, all referred to as System #1, controlled by baghouse DS61rated at 99.99% efficiency.
- (b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225) & discharge (#BC-205) conveyor intake (#BC-203), all referred to as System #2, controlled by baghouse DS62 rated at 99.99% efficiency.
- (c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three surge hoppers, weigh hopper (#S-14), all referred to as System #3, controlled by baghouse DS63 rated at 99.99% efficiency.
- (d) The Peco loading system and ship loading, all referred to as System #4, controlled by baghouse DS65 rated at 99.99% efficiency.
- (e) Pneumatic dust handling system, DR41 and DR43, referred to as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is recirculated into the dust handling system.
- (f) Two (2) natural gas fired grain dryers, each rated at 40 million BTU per hour, with particulate emissions controlled by an internal cyclone and filter bed rated at 98.0% efficiency.
- (g) One open-grain storage pile, with a maximum capacity of 750,000 bushels.

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#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

# **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

# **Stack Summary**

Stack ID	Operation	Height (feet)	Dimensions (feet)	Flow Rate (acfm)	Temperature (°F)
DS 61	truck / rail receiving	25	4 x 3	42000	ambient
DS 62	product handling	25	4 x 3	28000	ambient
DS 63	product handling	120	4 x 3	21000	ambient
DS 65	barge loadout	30	1 x 2	19000	ambient
DR 41/43	grain dryers	75	60 x 9	300000	180

# **Existing Approvals**

The source was issued a construction permit, 127-5320-00025, for an increase in enclosed grain storage on June 20, 1996. The construction did not take place.

There is a third grain dryer at the source that is nonfunctional. Approval is not being sought to operate it in this application.

The source has been operating under previous approvals including, but not limited to, the following:

- Exemption 127–11200-00025, issued on October 8, 1999 for an open grain storage pile. (a)
- (b) Operation Permits 64-07-89-0186, 64-07-89-0187, and 64-07-89-0188, issued on July 17, 1985.

All conditions from previous approvals were incorporated into this FESOP.

#### **Enforcement Issue**

On March 10, 1999, this source was referred to the Office of Enforcement for failing to submit an application for a Title V operating permit (Part 70 or FESOP). The referral has not resulted in a Notice of Violation at the present time.

# Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on June 30, 1999. Additional information was received on September 20, 1999.

#### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (4 pages).

The applicant has submitted calculations with the application. Those calculations are included as Appendix B (14 pages)

#### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	509
PM-10	509
SO <sub>2</sub>	0.2
VOC	1.9
CO	29.4
NO <sub>x</sub>	35.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all pollutants will be limited to less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 but is instead subject to the provisions of 326 IAC 2-8.

# **Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units after federally enforceable limits and controls:

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	СО	NO <sub>X</sub>	HAPs
Total Emissions	4.6	4.6	0.2	35.0	1.9	29.4	negligible

#### **County Attainment Status**

The source is located in Porter County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	severe nonattainment
СО	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and  $NO_{\chi}$  emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone.

# **Federal Rule Applicability**

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits opacity from grain dryers, grain handling operations, grain loading and grain unloading as described further in the TSD.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on June 30, 1999. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source was existing as of July 27, 1997, this revision is not classified as a reconstruction under 40 CFR 63.41, and the revision does not by itself have potential to emit HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Porter County and it has the potential to emit more than ten (10) tons per year of nitrogen oxides. Pursuant to this rule, the source must annually submit an emission statement for the source. The annual statement must contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

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#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging periods determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

# 326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust may not be visibly crossing the property lines of the source, except as provided in 326 IAC 6-4-6.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to 326 IAC 6-5. Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on June 30, 1999. The plan consists of using outdoor storage on an as-needed basis, such as in an overflow situation.

#### State Rule Applicability - Open Grain Storage Pile

There are no state rules specifically applicable to the facility.

#### State Rule Applicability - Two Grain Dryers

326 IAC 12 (40 CFR 60.300, Subpart DD)

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits opacity from grain dryers to 0% opacity.

326 IAC 6-3-2 (Particulate Emissions Limitations)

This emission unit is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates greater than sixty thousand (60,000) pounds per hour:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$  rate of emission in pounds per hour and  $P =$  process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour. The control equipment shall be in operation at all times the facility is in operation, in order to comply with this limit.

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#### **Previous Emission Limitations**

Prior construction and operation permits limit particulate emissions from grain drying to 25 tons per year. The dryer throughput will be limited to 29,500,000 bushels per year at an emission rate of 0.01 gr/dscf in order to comply with this limit.

# State Rule Applicability - Truck Unloading

326 IAC 12 (40 CFR 60.302, Subpart DD)

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits fugitive emissions from truck unloading operations to 5% opacity.

#### **Previous Emission Limitations**

Prior construction and operation permits limit particulate emissions from all grain loading and unloading operations to 20 tons per year. The control device will be limited to an emission rate of 0.0088 gr/dscf in order to comply with this limit.

### State Rule Applicability - Railcar Unloading

326 IAC 12 (40 CFR 60.302, Subpart DD)

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits fugitive emissions from truck loading, railcar unloading, and railcar loading operations to 5% opacity.

#### **Previous Emission Limitations**

Prior construction and operation permits limit particulate emissions from loading and unloading operations to 20 tons per year. The control device will be limited to an emission rate of 0.0088 gr/dscf in order to comply with this limit.

#### State Rule Applicability - Grain Handling

326 IAC 12 (40 CFR 60.302, Subpart DD)

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits emissions from grain handling operations to 0% opacity and 0.01 gr/dscf or less.

326 IAC 6-3-2 (Particulate Emissions Limitations)

This emission unit is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates greater than sixty thousand (60,000) pounds per hour:

$$E = 55.0 P^{0.11} - 40$$
 where  $E =$ rate of emission in pounds per hour and  $P =$ process weight rate in tons per hour

For a process weight rate of 120 tons per hour, the equation states an emission limit of 53.1 pounds of particulate matter per hour. The control equipment shall be in operation at all times the facility is in operation, in order to comply with this limit.

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Prior construction and operation permits limit particulate emissions from all grain handling operations to 2 tons per year. The control device will be limited to an emission rate of 0.001 gr/dscf in order to comply with this limit.

# State Rule Applicability - Truck Loading

326 IAC 12 (40 CFR 60.302, Subpart DD)

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits fugitive emissions from truck loading operations to 10% opacity.

#### **Previous Emission Limitations**

Prior construction and operation permits limit particulate emissions from loading and unloading operations to 20 tons per year. The control device will be limited to an emission rate of 0.0088 gr/dscf in order to comply with this limit.

# State Rule Applicability - Barge Loading

326 IAC 12 (40 CFR 60.302, Subpart DD)

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits fugitive emissions from barge loading operations to 20% opacity.

#### **Previous Emission Limitations**

Prior construction and operation permits limit particulate emissions from loading and unloading operations to 20 tons per year. The control device will be limited to an emission rate of 0.0088 gr/dscf in order to comply with this limit.

# State Rule Applicability - Railcar Loading

326 IAC 12 (40 CFR 60.302, Subpart DD)

This source is subject to the New Source Performance Standards, 326 IAC 12 (40 CFR 60.300, Subpart DD) "Standards of Performance for Grain Elevators." This rule limits fugitive emissions from railcar loading operations to 5% opacity.

#### **Previous Emission Limitations**

Prior construction and operation permits limit particulate emissions from loading and unloading operations to 20 tons per year. The control device will be limited to an emission rate of 0.0088 gr/dscf in order to comply with this limit.

# **Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are

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Pormit Poviower: Allen B. Dovideo

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found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- 1. All control devices will be required to be operated when an associated process that it controls is in operation.
- 2. The pneumatic dust handling system (System #5) is required to return all exhaust air in a closed-loop system. Therefore, there will be no emissions from this system after controls.
- 3. Daily visible emissions observations shall be made to determine whether emissions are considered normal or abnormal.
- 4. Weekly pressure monitoring of baghouses will be required. Readings will be taken with a magnehelic gage. Pressure drops are considered normal when in the 2.5 -4.0 inch range.
- 5. At least once every four months, a work order will be issued on all control devices to check valves, seals, chains, belts, oil levels, bearings, motors, filters, etc. and perform any needed maintenance.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as hazardous air pollutants on the Office of Air Management (OAM) FESOP Application Form GSD-08.

This source will emit levels of hazardous air pollutants less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments. See attached calculations for detailed hazardous air pollutant calculations.

#### Conclusion

The operation of this grain terminal shall be subject to the conditions of the attached proposed FESOP No. 127-11201-00025.

# Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

# **Source Background and Description**

Source Name: Cargill, Inc.

Source Location: Burns Waterway Harbor, Portage, IN 46368

County: Porter SIC Code: 5153

Operation Permit No.: 127-11201-00025
Permit Reviewer: Allen R. Davidson

On June 30, 1999, the Office of Air Management (OAM) had a notice published in the <u>Vidette Messenger</u> stating that Cargill, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a grain terminal located at Burns Waterway Harbor, Portage, IN 46368. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Jim Simpson of Cargill, Inc. commented on the proposed FESOP. The summary of the comment is as follows:

#### Comment:

Dust Tank #5 no longer exists at the plant. All grain dust is recirculated in the dust handling system immediately. Cargill requests that the references to Dust Tank #5 be removed from the permit.

#### Response:

The references to Dust Tank #5 have been removed from Condition A.2 in the final permit:

#### A.1 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This source consists of the following emission units and pollution control devices:

- (a) Two truck dumps, one rail car dump, and one rail loadout, all referred to as System #1, controlled by baghouse DS61rated at 99.99% efficiency.
- (b) Leg intakes (#L-30, L-31, L-33, L-34 & L-35), dust tank (#5), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225) & discharge (#BC-205) conveyor intake (#BC-203), all referred to as System #2, controlled by baghouse DS62 rated at 99.99% efficiency.
- (c) Leg elevator intake (#L-32), distributor heads (#TH-1, TH-3, TH-8 & TH-9), conveyors to silo (#BC-208 & #BC-209), conveyor to steel bin (#BC-213), three surge hoppers, weigh hopper (#S-14), all referred to as System #3, controlled by baghouse DS63 rated at 99.99% efficiency.
- (d) The Peco loading system and ship loading, all referred to as System #4, controlled by baghouse DS65 rated at 99.99% efficiency.

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Reviewer: Allen R. Davidson

(e) Pneumatic dust handling system, DR41 and DR43, referred to as System #5, controlled by baghouse DS64 rated at 99.99% efficiency. The baghouse exhaust is recirculated into the dust handling system.

- (f) Two (2) natural gas fired grain dryers, each rated at 40 million BTU per hour, with particulate emissions controlled by an internal cyclone and filter bed rated at 98.0% efficiency.
- (g) One open-grain storage pile, with a maximum capacity of 750,000 bushels.

Furthermore, the facility description in Section D.2 was changed to read as follows:

Facility Description [326 IAC 2-8-4(10)]:

Leg intakes (#L-30, L-31, L-33, L-34 & L-35), -dust tank (#5), conveyor intake (#BC-226), conveyor intake & discharge (#BC-204), conveyor intake (#BC-225) & discharge (#BC-205) conveyor intake (#BC-203), all referred to as System #2, controlled by baghouse DS62 rated at 99.99% efficiency.

#### Appendix A: Emissions Calculations

Company Name: Cargill, Inc.

Address City IN Zip: Burns Waterway, Portage, IN 46368

CP: 127-11201 Plt ID: 127-00025 Reviewer: Allen R. Davidson Date: October 14, 1999

The following calculations determine the potential to emit based on limits imposed by 40 CFR 60.302

DS61	System #1:	Truck unloading / ra	ail unloading					
0.01 grain *	42000 acf *	528 deg. R *	* (100 - 0	) % moisture *	525600 min *	1 lb *	1 ton =	15.65 ton/yr
dscf	min *	(460 + 72 ) de	eg. R * 100	% moisture *	year	7000 grain	2000 lb	
DS62	System #2:							
0.01 grain *	28000 acf *	528 deg. R 3	* (100 - 0	) % moisture *	525600 min *	1 lb *	1 ton =	10.43 ton/yr
dscf	min *	(460 + 72 ) de	eg. R * 100	% moisture *	year	7000 grain	2000 lb	
DS63	System #3							
0.01 grain *	21000 acf *	528 deg. R *	* (100 - 0	) % moisture *	525600 min *	1 lb *	1 ton =	7.82 ton/yr
dscf	min *	(460 + 72 ) de	eg. R * 100	% moisture *	year	7000 grain	2000 lb	
DS65	System #4:	PECO loading syste	em / ship loading					
0.01 grain *	19000 acf *	528 deg. R 3	* (100 - 0	) % moisture *	525600 min *	1 lb *	1 ton =	7.08 ton/yr
dscf	min *	(460 + 72 ) de	eg. R * 100	% moisture *	year	7000 grain	2000 lb	
DR41/DR43	Grain Dryers							
0.01 grain *	300000 acf *	528 deg. R *	* (100 - 0	) % moisture *	525600 min *	1 lb *	1 ton =	92.92 ton/yr
dscf	min *	(460 + 180 ) de	eg. R * 100	% moisture *	year	7000 grain	2000 lb	
_							Total:	133.91 ton/yr

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Total:

46.61 ton/yr

Prior permits limit emissions from grain drying to less than 25 tons PM per year. The following calculations determine limits to be placed on the grain dryers:

25 ton PM/yr \* 2000 lb/ton \* 2000 lb/ton = = 29,761,905 bushels/yr
3 lb PM/ton grain \* 2% emitted 56 lb/bushel

The grain dryers will be limited to 29.5 million bushels per year.

The following emission limits would be needed to comply with previous permit conditions:

DS61	System #1:											
0.0088 grain *	42000 acf *	528 deg. R	* (100 -	0	) % moisture *	525600	min *	1	lb *	1	ton =	13.77 ton/yr
dscf	min *	(460 + 72	) deg. R *	100	% moisture *		year	7000	grain	2000	lb	
DS62	System #2:											
0.001 grain *	28000 acf *	528 deg. R	* (100 -	0	) % moisture *	525600	min *	1	lb *	1	ton =	1.04 ton/yr
dscf	min *	(460 + 72	) deg. R *	100	% moisture *		year	7000	grain	2000	lb	
DS63	System #3											
0.001 grain *	21000 acf *	528 deg. R	* (100 -	0	) % moisture *	525600	min *	1	lb *	1	ton =	0.78 ton/yr
dscf	min *	(460 + 72	) deg. R *	100	% moisture *		year	7000	grain	2000	lb	
DS65	System #4:											
0.0088 grain *	19000 acf *	528 deg. R	* (100 -	0	) % moisture *	525600	min *	1	lb *	1	ton =	6.23 ton/yr
dscf	min *	(460 + 72	) deg. R *	100	% moisture *		year	7000	grain	2000	lb	
DR41/DR43	Grain Dryers	(limited through	out)									24.78 ton/yr
	•		•									•